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MEMO ENDORSED

January 13, 2025

**BY ECF**

The Honorable Andrew L. Carter  
United States District Judge  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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ELECTRONICALLY FILED  
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DATE FILED: January 14, 2025

Re: *Steve Lopez v. City of New York, et al.*, 23 CV 9339 (ALC)(SN)

Dear Judge Carter:

I represent the plaintiff in the above-referenced civil rights action. I write jointly with counsel for defendant the City of New York, to request a further enlargement of the deadlines for the City to respond to the complaint as well as for plaintiff effectuate service upon the individually named defendants. The parties now request that the current deadlines of January 13, 2025 (for the City to answer) and February 13, 2025 (for plaintiff to effectuate service) be enlarged to March 13, 2025 and April 14, 2025, respectively.

Since defendants last wrote on behalf of the parties (ECF Doc. 27) and the Court granted the prior extension (ECF Doc. 28), the parties have made substantial and meaningful progress towards a potential resolution of all claims which, if achieved, would obviate the need for service on 19 individually named defendants and would resolve this litigation in full without taking up the Court's time and resources.

Given the cooperation of the parties to date, and their confidence that discussions have progressed significantly and productively and may soon bear fruit should the Court be inclined to grant this request, we ask the Court to enlarge the deadlines for the City to answer and for plaintiff to serve by an additional (and hopeful final) sixty days.

Thank you for your consideration.

Respectfully,

*Brett Klein*

Brett H. Klein

cc: Brian Francolla, Esq.  
Hannah Faddis, Esq.

SO ORDERED:  
  
HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

January 14, 2025  
New York, NY